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June 23, 2018

The Hon. Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Jason Galanis et al.  
16-cr-0371-4 (RA)

Dear Judge Abrams:

At the Court's request, we write on behalf of our client, Bevan Cooney, to offer the following defense exhibits into evidence over the government's objection for the reasons set forth below: **DX3235, DX3154, DX3003, DX3605, DX3756**. Copies of all of these exhibits were handed up the Court yesterday but again our attached hereto for the Court's review.

**DX3235** is a critical email that Jason Galanis sent to Bevan Cooney:

**Coon the wiring instructions are on the second page. Thank you so much for handling this for us. the real estate proceeds will pay it off, but thank you for taking the shot....again**

**love you**

**J**

This email entirely corroborates Mr. Cooney's defense that Jason Galanis was taking advantage of him and getting money from him toward's one of the business deals involving Dr. Rory Knight who was the owner of Oxford Metrica. Jason Galanis' words to Cooney thanking him for handling this for us and taking the shot again. Specifically, in this email Jason Galanis assures Mr. Cooney **that the proceeds from the real estate sale will pay of Mr. Cooney's payment of \$35,000**. Mr. Cooney has always maintained that the 3.8 million dollars that was wired into his account and almost immediately wired toward Camden Escrow was in furtherance of real estate transaction. Hugh Dunkerly testified that Jason Galanis was making home improvements on 1920 Bel Air and there were photos of 1920 Bel Air admitted that Dunkerly testified showed those home improvements. The government appears to argue that this was a sham real estate transaction and this email confirms Mr. Cooney's state of mind regarding his intent to obtain a loan and purchase 1920 Bel Air as part of a business transaction. Again this is perhaps one of the most crucial emails Mr. Cooney's has to prove his theory of defense and his state of mind that all along it was their intent to make improvements on 1920 Bel Air and eventually sell it at a profit. This evidence shows that Galanis manipulated Mr. Cooney to get money from him and is consistent with Mr. Cooney's innocent state of mind.

**DX3153** is another defense exhibit which proves Mr. Cooney's state of mind when he invested \$400,000 in Burnham when he sends her a NY Times article saying " This is why we bought burnham mom. Drexel Burnham just has an amazing history." The Government case against Mr. Cooney is largely built on approximately 2 dozen emails of Mr. Cooney making innocuous comments that they will argue his guilty state of mind. This email counters that evidence and Mr. Cooney's state of mind why he invested in Burnham.

**DX3003** is an email sent from Jason Galanis to Bevan Cooney in September 2014 just before Mr. Cooney purchased the second tranche of bonds. Jason Galanis lays out several positive aspects to the bonds and he includes an American Indian Law article about Greenburg Traurig, the lawfirm representing the WLCC. This email is clearly classic Jason Galanis at a critical moment emailing Mr. Cooney to show the sound legitimacy of the WLCC bond.

**DX3605** is an email sent from Mr. Cooney to his Eric Fulton, his business manager which forwards a chart from Steven Weiss which lays out Mr. Cooney's contribution to Burnham in the amount of \$400,000.

**DX3756** is a letter which has been authenticated and shows that Mr. Cooney was a client in good standing with Citi National Bank since 2002. The government has put in evidence emails relating to Mr. Cooney's corporate rental of a NYC apartment. This reference letter was submitted as part of that rental application. This letter corroborates Mr. Cooney's defense that he had a longstanding relationship with Citi National Bank and that his failure to repay his 1.2 million dollar loan was inconsistent with his prior record of good faith and good dealing evidence by this letter. ("CNB"). The government's case relies on Steve Shapiro a banker from CNB.

Cc: (via email  
and Ecf)

Respectfully submitted,  
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